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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street. SW
Washington, DC 20590-0001

RE: Docket No: FAA-2002-12261

Dear Sir:

As a concerned airline pilot I would like to add my support to the proposed implementation of RVSM within the National Airspace System (NAS) of the contiguous 48 United States, Alaska and the Gulf of Mexico where the FAA provides air traffic control services. The benefits of RVSM, which would increase the number flight altitudes that would be available to operators thus allowing more flight to be flown at more fuel efficient altitudes and tracks while increasing system capacity, reducing delays, would far out weigh the negative cost to the operator over the long term.

However, I am extremely disappointed that the FAA would propose to introduce RVSM within the NAS and does not intend to require that "ALL" aircraft operating within that airspace to be TCAS equipped, as outlined in the FAA proposed Rule 14CFR part 91, Appendix G.

TCAS is a vital safety tool especially when aircraft are within 1,000 foot vertical separation and at closure rates in excess of 1,000 miles per hour. In addition, aircraft operating within the domestic RVSM will be operating within the busiest airspace any where in the world and over highly populated cities here in the US require the added "Safety" protection that TCAS can provide. Any equipment malfunction or weather related event that causes an altitude excursion will be seen by the other aircraft, in there immediate vicinity, if both aircraft are TCAS equipped and conflict arises which produces a "Resolution Advisory" an accident is averted. If only one aircraft has TCAS or if neither are TCAS equipped then we leave the outcome to luck or statistics that collusion will not occur. I don't believe that any pilot or the traveling public would find that leaving there fate to luck as acceptable. I certainly do not.

I therefore recommend that the FAA reconsider there position and require TCAS within the proposed RVSM airspace for all aircraft.

Respectfully Submitted,

Charles H. Mc Cabe